

**BRIAN KAPLAN, P.C.**

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**VIA ECF**

February 8, 2022

Honorable Colleen McMahon  
United States District Court  
Southern District  
500 Pearl Street  
New York, New York 10007

**Re: U.S.A. v. Sanjay LaForest  
21 Cr. 272 (CM)**

Dear Judge McMahon:

As you are aware, I represent the aforementioned defendant, Sanjay LaForest. The bail conditions presently limit Mr. LaForest's travel to the Southern and Eastern Districts of New York and to New Jersey. I am respectfully requesting a modification of the release order. I am hereby requesting that Mr. LaForest be allowed to travel to Florida from February 15<sup>th</sup>, 2022 to March 5, 2022. Your Honor approved a recent request for Mr. Laforest to travel to Florirda in order to supervise a design project. That project was not completed and he is needed to continue supervising the project. The address and other details of the project have been provided to pre-trial services. Assistant United States Attorney Matthew Shahabian and Pre-Trial Services Officer Laura Gialanella have no objection to the proposed modification.

Please contact me if you have any questions or concerns.

Sincerely,



Brian Kaplan, Esq.

**SO ORDERED:**

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**Honorable Colleen McMahon**

CC: AUSA Matthew Shahabian  
(Via ECF)